

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

In Re: ) IN CHAPTER 7 PROCEEDINGS  
 )  
DEBRA R. SIMPKINS ) BK 08-30025  
 )  
Debtor. )

**RESPONSE TO DEBTOR'S MOTION TO REOPEN CASE  
FOR PURPOSE OF AMENDING SCHEDULE B AND  
SEEKING ABANDONMENT OF NEWLY SCHEDULED ASSET**

Comes now Donald M. Samson, former trustee of the above captioned bankruptcy, and shows that he has no objection to the bankruptcy being reopened to amend the schedules to add an asset but would, if reappointed, object to abandonment of the asset prior to an opportunity to fully investigate the value of the asset to determine whether it should now be administered as an asset case.

WHEREFORE, Donald M. Samson, prays that the case be reopened and for such further relief as this Court deems just and equitable.

DATE: 2/21/13

/s/ Donald M. Samson \_\_\_\_\_  
DONALD M. SAMSON, Trustee  
226 W. Main St., Ste. 102  
Belleville, IL 62220  
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**CERTIFICATE OF SERVICE**

The undersigned certifies that on the 21st day of February, 2013, a copy of the foregoing document, Response to Debtor's Motion to Reopen Case for Purpose of Amending Schedule B and Seeking Abandonment of Newly Scheduled Asset, was served upon the following electronically or by first class mail, postage prepaid:

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/s/ Janice Moore \_\_\_\_\_